

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF: 5HS-11

August 4, 1989

Peter Vagt, PhD
Warzyn Engineering Inc.
One Pierce Place
Suite 1110
Itasca, Illinois 60143-2681

RE: Request for Modification to the RI/FS Work Plan for the American Chemical Services NPL Site

Dear Peter:

Section XII of the RI/FS Consent Order for this site, requires that any modification to the RI/FS Work Plan requested by either Party, must be concurred with by the other Party prior to its implementation or face provisions of the Dispute Resolution.

Your requested modification to the RI/FS Work Plan includes the method that will be used to collect soil samples from the area known as the "Kapica Drum" area of the site. Specifically, this includes the collection of soil sample SB-01. The Work Plan currently calls for the use of a hollow stem auger with a split spoon sampler, to collect a visually contaminated and an underlying natural "clean" soil sample from certain areas associated with the Kapica Drum area. Attempts to perform this work have met with some difficulty due to the large amount of buried metal in the ground near the Kapica Drum area. Another area that has met with some difficulty is the area associated with SB-04. This area originally was supposed to have a waste or visually contaminated soil sample taken along with a sample of the underlying natural materials. Due to the nature of the wastes encountered at this location (a black oily liquid), the underlying soil sample was not taken. The sample was not taken, because it was feared that to do so may contaminate the underlying soil sample, and provide a route for migration of the oily liquid.

As you suggested over the telephone, the use of a test pit could be used as an alternative to the hollow stem auger, for the collection of soil samples at the Kapica Drum area and specifically SB-01. I concur with this approach for two reasons: 1) the use of a test pit will give a much better indication of the near subsurface conditions at this portion of the site; and 2) the best representative sample of the wastes and underlying soil will be collected.

Pertaining to sample SB-04, a representative sample of the underlying natural soils may best be collected by moving to an alternative boring location between the original boring location and a location where the black liquid was not encountered, or by digging a test pit in a similar location. Either approach is acceptable, however, by digging a test pit the advantages cited above are evident.

As you know, I will be on vacation for the next two weeks (August 7 - 18), during

this time, I will attempt to call you to check in on activities at the site and to hear what you have decided to do concerning the area near SB-04. I have arranged for another RPM, Dion Novak, to act in my stead concerning any decisions that may have to be made concerning the RI activities, if I am not available. If you need to discuss anything with Dion, please call him at 886-4737.

Sincerely,

Robert E. Swale

Remedial Project Manager

cc: Arthur Carter, IDEM